

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

MOHAWK RE-BAR SERVICES, Inc.,)	
)	
Plaintiff,)	
)	Case No.: 1:14cv137
v.)	Judge Wells
)	
INTERNATIONAL ASSOCIATION OF)	
BRIDGE, STRUCTURAL,)	
ORNAMENTAL, and REINFORCING)	
IRON WORKERS LOCAL UNION)	
NO. 17, et al.,)	
)	
Defendants.)	

AFFIDAVIT OF ERIC DEAN

1. My name is Eric Dean. I am over the age of 18 and am competent to give this Affidavit.
2. The testimony in this Affidavit is based upon my own personal knowledge and I would testify consistently if called to do so at trial.
3. I am the General Secretary of the International Association of Bridge, Structural, Ornamental and Reinforcing Iron Workers, AFL-CIO. I have held this position since 2011.
4. I have reviewed a copy of plaintiff's Complaint. The copy of the National Reinforcing Steel Agreement ("Rebar Agreement") attached as Exhibit C to plaintiff's Complaint is not a complete copy of that document. Attached and incorporated as Exhibit 1 is the full copy of the Rebar Agreement.

FURTHER AFFIANT SAYETH NAUGHT.



ERIC DEAN

DISTRICT OF COLUMBIA)
) SS.
)

ERIC DEAN, being duly sworn upon his oath, states that he is of lawful age and that the facts and matters contained in the foregoing Affidavit are true and correct according to his best knowledge, information and belief.

X 

ERIC DEAN

Subscribed and sworn to before me this 14th day of February, 2014.



Notary Public

My Commission Expires:

Maureen O. Scott
Notary Public District of Columbia
My Comm. Expires Nov. 14, 2015